

CVCWA

CENTRAL VALLEY CLEAN WATER ASSOCIATION

Formerly the Central Valley Wastewater Manager's Association

Representing Over Forty Wastewater Agencies



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April 3, 2007

Mr. Kenneth D. Landau
Assistant Executive Officer
Regional Water Quality Control Board
Central Valley Region
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

RECEIVED
SACRAMENTO
CVR WQCB
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SUBJECT: Waste Discharge Requirements for City of Angels Wastewater
Treatment Plant, Calavares County (NPDES No. CA000XXXX)

Dear Mr. Landau:

The Central Valley Clean Water Association ("CVCWA") has reviewed the proposed *Waste Discharge Requirements for City of Angels Wastewater Treatment Plant* ("tentative order"). In particular, CVCWA is concerned with the Regional Water Quality Control Board's ("Regional Board") continued application of the agricultural water quality goals from the *Water Quality for Agriculture, Food and Agriculture Organization of the United Nations – Irrigation and Drainage Paper No. 29, Rev. 1* (R.S. Ayers and D.W. Westcot, Rome, 1985) ("UN Report") with out the consideration of site-specific conditions as directed by the State Water Resources Control Board ("State Water Board") in its *City of Woodland* decision. (Order WQO 2004 -0010.)

Although the Regional Board does not ultimately adopt final effluent limitations based on the agricultural water quality goals as contained in the UN Report (due to the low levels of salinity contained in the City's effluent) in this tentative order, the fact sheet indicates that the Regional Board staff continues to use the most conservative agricultural water quality goals from the UN Report with out the consideration of site-specific factors. (Fact Sheet at pp. F-21-F-23.) For chloride, the fact sheet states that the recommended agricultural water quality goal is 106 mg/L as a long-term average based on the UN Report. (Fact Sheet at p. F-21.) Similarly, the fact sheet identifies 700 umhos/cm as the agricultural water quality goal for electrical conductivity based on the UN Report. (Fact Sheet at p. F-22.) In neither case does the fact sheet include a discussion regarding site-specific conditions that could affect the appropriate value to apply for protection of the agricultural beneficial use.